

# EXHIBIT B

Excerpt of the second discovery letter, dated February 12, 2015.



**U.S. Department of Justice**

***Carmen M. Ortiz***  
*United States Attorney*  
*District of Massachusetts*

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February 12, 2015

**Via Federal Express**

Bruce Singal  
Michelle Peirce  
Donoghue Barrett & Singal  
One Beacon Street, Suite 1320  
Boston, Massachusetts 02108

Re: United States v. Barry Cadden, et al., 14-cr-10363-RGS

Dear Counsel:

Pursuant to Fed. R. Crim. P. 16 and Rules 116.1 and 116.2 of the Local Rules of the United States District Court for the District of Massachusetts, the government hereby provides supplemental discovery in this case.

As you know, on January 16, 2015, the government filed a motion for a protective order to govern confidential discovery materials produced in this case. The Court has not yet ruled on the motion as of this date. The discovery materials produced herein contain highly sensitive personal, medical, and financial information. We request that you treat all of the discovery materials produced herein as if they are governed by the proposed order we filed with the Court, and not share them outside the terms of that proposed order, until the Court has ruled on the motion. If the Court grants the government's motion, we will designate which documents are governed by the protective order. If you will not agree to this, please let us know immediately.

Enclosed with this letter are the following:

Documents and Records Produced in PDF and Native Format on the Hard Drive

- Law enforcement reports regarding the arrests of the defendants and other miscellaneous reports (DOJ\_NECC003614228-DOJ\_NECC003614386; DOJ\_NECC003705027-DOJ\_NECC003705031) (*folder name: Arrest & Miscellaneous Reports*);

- Additional documents and photos from the Centers for Disease Control and Prevention (DOJ\_NECC003614387-DOJ\_NECC003614399) (*folder name*: CDC Documents);
- Additional certified inventories of evidence from the Food and Drug Administration – Office of Criminal Investigations (DOJ\_NECC003614400-DOJ\_NECC003614535) (*folder name*: CIEs);
- Additional correspondence regarding the search warrant filter procedure (DOJ\_NECC003614542-DOJ\_NECC003614547) (*folder name*: Correspondence);
- Additional notes of law enforcement agents taken during the course of the investigation (DOJ\_NECC003614548-DOJ\_NECC003614679) (*folder name*: Miscellaneous Agent Notes);
- Documents and records obtained from medical facilities that purchased NECC products (DOJ\_NECC003614680-DOJ\_NECC003702410) (*folder name*: Responses – Clinics);
- Documents and records obtained from third parties (DOJ\_NECC003702411-DOJ\_NECC003703729) (*folder name*: Responses – Third Parties);
- Additional documents and records seized during the search warrant at NECC executed on October 31, 2012 (DOJ\_NECC003703730-DOJ\_NECC003704100) (*folder name*: Seized Materials);
- Additional interview reports, documents, and photos related to victims (DOJ\_NECC003704101-DOJ\_NECC003704712) (*folder name*: Victim Records); and
- Additional interview reports and agent notes (DOJ\_NECC003704713-DOJ\_NECC003705026) (*folder name*: Witnesses).

#### Documents and Records Produced in Electronic Databases

- Original production from AOL regarding the e-mail account knobknee@aol.com (2 zip files and accompanying cover letter);
- Documents and records obtained from Bank of America (approximately 3K documents/6K pages) (1826E\_00000001-1901E\_00000070) (*database name*: BOA);
- Documents and records obtained from the Food and Drug Administration (approximately 70K documents/484K pages) (FDA\_E00000001-FDA\_E00484172) (*database name*: FDA);
- Documents and records obtained from HCA Healthcare (approximately 230 documents/1.7K pages) (HCA-00000001-HCA-0001705) (*database name*: HCA

Healthcare);

- Documents and records obtained from Lewis Gale Medical Center (approximately 1.2K documents/226K pages) (LGMC0000001-LGMC0225677; LGMC-EF0000001-LGMC-EF0000199; LGMC-EM0000001-LGMC-EM0000272) (*database name*: Lewis Gale);
- Electronic media obtained from NECC during execution of the search warrants (approximately 3K documents/31K pages) (USAO00278587-USAO00317301 (with gaps); USAODD00000001-USAODD00032622 (with gaps)) (*database name*: NECC SW Edata Ddesignated);
- Electronic media obtained from NECC during execution of the search warrants – the original database (approximately 121K documents/209K pages) (USAO00000001-USAO00278584 (with gaps)) (*database name*: NECC001);
- Documents and records obtained from Osceola Regional Medical Center (approximately 49 documents) (ORMC0000001-ORMC0000049) (*database name*: Osceola);
- Documents and records obtained from St. Thomas West Hospital (approximately 4K documents/18.5K pages) (STHS0001366-STHS0019962) (*database name*: St. Thomas);
- Documents and records obtained from St. Vincent’s Hospital (approximately 11 documents/9K pages) (STVIN00000001-STVIN00008890) (*database name*: St. Vincent’s);
- A spreadsheet identifying the Bates ranges of e-mails and records from the NECC SW Edata Ddesignated database that the government has identified during the course of its review as either “hot” or “relevant;” and
- A spreadsheet identifying the Bates ranges of e-mails and records from the NECC001 database that the government has identified during the course of its review as either “hot” or “relevant.”

Please note that in our January 14, 2015, production we provided an electronic database labeled AOL\_Chin that comprises e-mails and records obtained from AOL e-mail account knobknee@aol.com. The AOL\_Chin database was processed by our Office from the original production from AOL. With this letter, we are enclosing the original production from AOL on two zip files. The accompanying cover letter from AOL contains the password to access these files.

Furthermore, please also note that that the electronic database labeled NECC001 was the original database in which we stored the electronic media. This NECC001 database is a subset of the electronic media database labeled as NECC SW Edata, which was provided to you on January 14, 2015.

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